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September 9, 2010

Via E-Filing
Honorable Kathryn C. Ferguson
United States Bankruptcy Court
402 East State Street
Trenton, New Jersey 08608

Re: Debtor Estate of Shalom Torah Centers
Case No. 10-15444-KCF

Motion to Vacate Automatic Stay filed by The Avi Chai Foundation
Hearing Date: September 14, 2010 at 10:00 a.m.

Dear Judge Ferguson:

Please be advised that this office represents the Debtor and submits this letter in opposition to the Motion to Vacate Automatic Stay filed by The Avi Chai Foundation returnable September 14, 2010.

For the reasons set forth in the opposition to the Motion to Vacate Stay filed by Amboy Bank and by A. Joseph Stern, the Debtor opposes the Motion and joins in the opposition.

As the equity exists in the property over and above the second mortgage and the first mortgage is presently being paid by A. Joseph Stern there does not appear to be any basis under 11 U.S.C. §362 to vacate the automatic stay and the movant has not met its burden of proof to obtain such relief.

For the reasons expressed by A. Joseph Stern and Amboy Bank the Debtor requests that the Motion be denied.

Very Truly Yours,

//s// Barry W. Frost, Esquire

Barry W. Frost, Esquire

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cc: David Bruck, Esquire (Via E-Mail)
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